



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 11, 2018

By FedEx and ECF

Robert J. Cleary, Esq.
Dietrich L. Snell, Esq.
Brittany N. Benavidez, Esq.
Proskauer Rose LLP
Eleven Times Square
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter, the contents of which have been designated "Sensitive Discovery Material" under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37) (the "February 22 Order"). This disclosure supplements the government's earlier disclosures under cover of letters dated February 15, May 22, May 24, June 12, July 12, July 24, August 30, October 24, December 1, December 8, December 14, December 17, and December 22, 2017, and January 15, January 18, January 19, February 2, February 7, and February 15, 2018. The government renews its request for reciprocal discovery from the defendant.

Enclosed is a redacted affidavit for the defendant's email account, which has been designated "Sensitive Discovery Material" under the February 22 Order and is Bates numbered DZ66645 – DZ66694. The affidavit was previously produced in discovery, under cover of letter dated July 12, 2017, with Bates numbers DZ61957 – DZ62006. The affidavit produced today contains fewer redactions than the previously produced version.

If you have any questions or requests regarding further discovery, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Douglas M. Pravda
Alexander A. Solomon
Douglas M. Pravda
Ian C. Richardson
Nicholas J. Moscow
Assistant U.S. Attorneys
(718) 254-7000

Enclosures (DZ066645-DZ066694)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)